

STEINBERG SHAPIRO & CLARK
Mark H. Shapiro (MI Bar No. P43134)
24901 Northwestern Hwy., Suite 611
Southfield, Michigan 48075
Telephone: (248) 352-4700
Email: shapiro@steinbergshapiro.com

Attorney for Central Transport International, Inc.

-----X	
UNITED STATES BANKRUPTCY COURT	:
SOUTHERN DISTRICT OF NEW YORK	:
	:
	:
In re:	:
	:
	Chapter 11
DELPHI CORPORATION, et al.,	:
	:
	Case No. 05-44481
Debtors.	:
	:
-----X	

**MOTION TO ALLOW AND COMPEL PAYMENT OF ADMINISTRATIVE
EXPENSE CLAIM PURSUANT TO 11 U.S.C. § 503(b)**

Central Transport International, Inc. ("CTII"), by its counsel, Steinberg Shapiro & Clark, respectfully moves this Court as follows:

1. This is CTII's Motion to allow and compel payment by Debtors of a § 503(b)(1) administrative priority claim to CTII in the amount of \$89,972.35. The Motion is filed pursuant to 11 USC § 503(b)(1)(A), and in accordance with the procedures set forth in LBR 9014-1. This is a contested matter under BR 9014. A proposed Order is attached as Exhibit "A".

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) over which this Court has jurisdiction pursuant to 28 U.S.C. § 1334.

3. On October 8 and 14, 2005, the Debtors filed voluntary petitions in this Court for reorganization relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-

1330, as then amended (the "Bankruptcy Code"). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession under Bankruptcy Code sections 1107(a) and 1108. This Court has ordered joint administration of these cases.

4. During the pendency of the Chapter 11, Debtors contracted with CTII for CTII to provide shipping and logistical services to the Debtors.

5. Debtors' contract for shipping and logistical services from CTII was in the ordinary course of business of Debtors and otherwise authorized by 11 U.S.C. § 363 or other sections of the Bankruptcy Code.

6. From October 15, 2005 through December 20, 2006, CTII provided shipping services to the Debtors in the amount for \$89,972.35. An itemized list of the invoices for this time period is attached as Exhibit "B".

7. During the relevant time periods, Debtors contracted with Data2Logistics to conduct freight bill audit and payment processing for the Debtors.

8. Pursuant to the parties' standard operating procedures, typically within one week of submitting invoices electronically, CTII submitted a hard copy of all invoices to Data2Logistics for audit and processing for payment.

9. Subsequently, in April of 2007, Data2Logistics requested and CTII provided a list of all outstanding invoices in electronic spreadsheet format.

10. Upon receipt of the electronic spreadsheet in April of 2007, Data2Logistics affirmatively indicated that the invoices were being processed for payment.

11. Despite numerous demands, Debtor has failed and/or refused to pay \$89,972.35 to CTII for shipping and logistical services contracted by Debtors during the pendency of the Chapter 11.

12. Pursuant to 11 U.S.C. § 507,

(a) An entity may timely file a request for payment of an administrative expense, or may tardily file such request if permitted by the court for cause.

(b) After notice and a hearing, there shall be allowed, administrative expenses, other than claims allowed under section 502(f) of this title [11 USCS § 502(f)], including--

(1) (A) the actual, necessary costs and expenses of preserving the estate.

13. The \$89,972.35 owed to CTII by Debtors arose from transactions with the Debtors as debtor-in-possession during the pendency of the Chapter 11 proceedings.

14. Pursuant to *Trustees of Amalgamated Ins. Fund v. McFarlin's, Inc.*, 789 F.2d 98, 101 (2d Cir. N.Y. 1986), an expense is entitled to administrative priority if (i) it arises out of a transaction between the creditor and the debtor in possession, and (ii) the consideration supporting the claimant's right to payment was both supplied to and beneficial to the debtor-in-possession in the operation of the business.

15. CTII's claim for \$89,972.35 arises out of shipping services provided directly to the Debtors and said shipping services were beneficial to the Debtors' operation of the business.

16. In accordance with *McFarlin's, Inc., supra*, and 11 U.S.C. § 503(b)(1)(A), CTII is entitled to allowance of an administrative claim in the amount of \$89,972.35.

WHEREFORE, Central Transport International, Inc. respectfully requests that this Court enter the proposed order attached as Exhibit A, allowing Central Transport International, Inc. an 11 USC § 503(b)(1)(A) administrative expense claim against Debtors in the sum of \$89,972.35 and compelling immediate payment of the allowed claim.

STEINBERG SHAPIRO & CLARK

/s/ Mark H. Shapiro (MI Bar No. P43134)
Attorney for Central Transport International, Inc.
24901 Northwestern Hwy., Suite 611
Southfield, MI 48075
(248) 352-4700
shapiro@steinbergshapiro.com

Date: June 4, 2009

Certificate of Service

I hereby certify that on June 4, 2009 a copy of the foregoing Motion to Allow and Compel Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b) and Notice of Motion was duly served to all registered parties through the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York, as well as via overnight mail to Debtor's counsel and Chambers of the Honorable Robert D. Drain, as well as via first-class mail to all parties on the Master Service List provided at www.delphidocket.com, and via electronic mail on all parties on the 2002 Service List provided at www.delphidocket.com, with the exception of those on the 2002 Service List without electronic mail addresses, in which case those parties were served via first-class mail.

/s/ Joy L. Brown, Legal Assistant
Steinberg Shapiro & Clark
24901 Northwestern Highways
Suite 611
Southfield, MI 48075
248-352-4700

STEINBERG SHAPIRO & CLARK
Mark H. Shapiro (MI Bar No. P43134)
24901 Northwestern Hwy., Suite 611
Southfield, Michigan 48075
Telephone: (248) 352-4700
Email: shapiro@steinbergshapiro.com

Attorney for Central Transport International, Inc.

-----X	
UNITED STATES BANKRUPTCY COURT	:
SOUTHERN DISTRICT OF NEW YORK	:
	:
	:
In re:	:
	:
	: Chapter 11
DELPHI CORPORATION, et al.,	:
	:
Debtors.	: Case No. 05-44481
	:
	:
-----X	

ORDER ALLOWING AND COMPELLING PAYMENT
OF ADMINISTRATIVE EXPENSE CLAIM OF
CENTRAL TRANSPORT INTERNATIONAL, INC.

This matter came before the Court on the Motion of Central Transport International, Inc. for an Order Allowing and Compelling Payment of Administrative Expense Claim (the “Motion”). The Motion was served on all parties in interest, and no objections were timely served. The Court has reviewed the Motion and is fully advised in this matter.

IT IS ORDERED as follows:

- a. Central Transport International, Inc.’s claim in the amount of \$89,972.35 as set forth in the Motion is allowed as an administrative expense of the estate; and
- b. The Debtor shall immediately remit the sum of \$89,972.35 to Central Transport International, Inc. in full and final satisfaction of Central Transport International, Inc.’s administrative claim set forth in the Motion.

ProNum	BillDate	Amount
4634808929DB	10/10/2005	\$81.57
4532059855DB	10/10/2005	\$751.72
4532059848DB	10/10/2005	\$262.57
3921523331DB	10/10/2005	\$163.89
6413781622DB	10/11/2005	\$76.46
4053992500DB	10/11/2005	\$1,756.80
7993521671DB	10/12/2005	\$26.51
5513737863DB	10/12/2005	\$5.04
4532059509DB	10/12/2005	\$726.03
4634809026DB	10/13/2005	\$50.35
4532059657DB	10/13/2005	\$626.03
4532059541DB	10/13/2005	\$264.74
7993527306DB	10/14/2005	\$150.90
7993527314DB	10/17/2005	\$64.90
7803609039DB	10/17/2005	\$50.18
4532060200DB	10/17/2005	\$699.04
4634733655DB	10/18/2005	\$42.37
4531984707DB	10/19/2005	\$628.06
4532066363DB	10/20/2005	\$247.30
7993522406DB	10/21/2005	\$50.18
7993521960DB	10/21/2005	\$50.18
7803644523DB	10/21/2005	\$36.23
7993521879DB	10/24/2005	\$50.40
7993475738DB	10/24/2005	\$50.40
7993475464DB	10/24/2005	\$50.40
4532066553DB	10/24/2005	\$624.00
3524419297DB	10/24/2005	\$29.96
3524419289DB	10/24/2005	\$21.06
4664194049DB	10/26/2005	\$42.94
4634753398DB	10/26/2005	\$13.61
4532067130DB	10/31/2005	\$2,681.70
1424067757DB	10/31/2005	\$191.03
4532067320DB	11/1/2005	\$764.53
7993532249DB	11/2/2005	\$57.56
7993522414DB	11/3/2005	\$50.85
8592356988DB	11/7/2005	\$94.95
6413651627DB	11/7/2005	\$89.67
2931004639DB	11/7/2005	\$205.46
7803649225DB	11/10/2005	\$142.04
7803644630DB	11/10/2005	\$117.73
4530569392DB	11/11/2005	\$220.07
4532055382DB	11/14/2005	\$177.52
2937034432DB	11/15/2005	\$1,435.66
7993556784DB	11/18/2005	\$50.18
7993564622DB	11/21/2005	\$64.03
3524422267DB	11/29/2005	\$82.20
3524422077DB	11/29/2005	\$140.32
3524394995DB	11/29/2005	\$274.24
1424067799DB	11/30/2005	\$63.01
7803913316DC	12/1/2005	\$25.00
7803606175DB	12/2/2005	\$58.82

4532076792DB	12/7/2005	\$41.23
3524415006DC	12/9/2005	\$1,573.02
1424109773DB	12/12/2005	\$61.75
7993597184DB	12/15/2005	\$48.83
4930912972DB	12/16/2005	\$41.23
4532064996DB	12/16/2005	\$41.23
7853717949DB	12/19/2005	\$48.60
4930914788DB	12/21/2005	\$240.02
4634619904DB	12/22/2005	\$41.64
4634619888DB	12/22/2005	\$41.04
4530462242DB	12/30/2005	\$43.20
4934001301DB	1/3/2006	\$48.60
7993566270DB	1/4/2006	\$291.17
4934006870DB	1/5/2006	\$161.15
7853681087DB	1/9/2006	\$48.60
4934006961DB	1/12/2006	\$160.96
3561835909DB	1/12/2006	\$48.60
7993592466DB	1/13/2006	\$48.60
4637430276DB	1/13/2006	\$41.04
4530568535DB	1/13/2006	\$41.04
5343451929DB	1/17/2006	\$43.20
4532113314DB	1/19/2006	\$43.20
1462403079DB	1/23/2006	\$105.97
4864533089DC	1/27/2006	\$12.24
7853695228DB	1/31/2006	\$48.60
4530578112DB	1/31/2006	\$43.20
7853694429DB	2/1/2006	\$48.60
7803924222DB	2/1/2006	\$141.63
7803915204DB	2/2/2006	\$88.84
4532095644DB	2/8/2006	\$41.23
4530578435DB	2/14/2006	\$41.23
1462411924DB	2/14/2006	\$48.83
4532064913DB	2/15/2006	\$169.13
7803914421DB	2/17/2006	\$142.29
9171995695DB	2/20/2006	\$58.34
4532099810DB	2/21/2006	\$43.40
4532073286DB	2/23/2006	\$74.28
1323704525DB	2/23/2006	\$50.81
4532094662DB	2/24/2006	\$43.40
4934083143DB	2/28/2006	\$108.17
7803914694DB	3/1/2006	\$48.83
1460404194DB	3/2/2006	\$49.14
9992270668DB	3/3/2006	\$41.23
4864675344DB	3/6/2006	\$48.60
4934083705DB	3/7/2006	\$48.60
5513934205DB	3/8/2006	\$7.56
4532127314DB	3/8/2006	\$698.88
4703902822DB	3/9/2006	\$49.44
4635026075DB	3/10/2006	\$48.60
4532100964DB	3/14/2006	\$43.40
4361572536DB	3/14/2006	\$43.40
4532128205DB	3/15/2006	\$599.04

4532128403DB	3/16/2006	\$624.00
4532101616DB	3/16/2006	\$43.40
4532128635DB	3/17/2006	\$618.80
4532143246DB	3/23/2006	\$624.00
0550347484DB	3/23/2006	\$36.59
4532142891DB	3/24/2006	\$624.00
4532152627DB	3/27/2006	\$624.00
7804078960DB	3/28/2006	\$285.04
4532153906DB	3/29/2006	\$624.00
4532155356DB	3/30/2006	\$624.00
7804078630DB	3/31/2006	\$200.78
7804078556DB	3/31/2006	\$240.93
4532155539DB	3/31/2006	\$624.00
7853757507DC	4/3/2006	\$1,573.14
4532153625DB	4/3/2006	\$724.00
1462425569DC	4/4/2006	\$43.60
7853760980DB	4/5/2006	\$49.05
3173859675DB	4/5/2006	\$2,855.85
4532148401DB	4/6/2006	\$312.00
1424184362DB	4/6/2006	\$122.92
7853779634DB	4/7/2006	\$49.05
7853770369DB	4/7/2006	\$49.05
4532148211DB	4/7/2006	\$661.60
4532149391DB	4/10/2006	\$618.80
4532100634DB	4/11/2006	\$43.60
4532131167DC	4/17/2006	\$16.33
7993684685	4/20/2006	\$74.55
4532148393DB	4/20/2006	\$49.28
7804011490DB	4/24/2006	\$247.62
3725191101DB	4/26/2006	\$85.18
4532151967DB	4/27/2006	\$43.80
4532147874DB	4/27/2006	\$43.80
4532147833DB	5/1/2006	\$44.20
4934211702DB	5/3/2006	\$227.25
4532163608DB	5/3/2006	\$44.20
7993710506DB	5/4/2006	\$72.42
3725252846DB	5/5/2006	\$85.96
1462447746DB	5/8/2006	\$49.73
7804041513DB	5/9/2006	\$401.71
4635144027DB	5/10/2006	\$44.40
6053052917DB	5/11/2006	\$84.95
4703872926DB	5/11/2006	\$84.84
4635062393DB	5/11/2006	\$137.69
5343525144DB	5/12/2006	\$44.20
4934200903DB	5/12/2006	\$49.95
3725180542DB	5/12/2006	\$85.33
3524356721DB	5/12/2006	\$60.38
4532148526DB	5/17/2006	\$50.18
4532172823DB	5/18/2006	\$410.63
7804089595DB	5/19/2006	\$379.06
4934219648DB	5/22/2006	\$44.60
4532174548DB	5/22/2006	\$53.39

7804121299DB	5/24/2006	\$254.68
4532174639DB	5/24/2006	\$330.19
4532194983DB	5/26/2006	\$50.18
4532166692DB	5/26/2006	\$44.60
4934228276DB	5/30/2006	\$44.60
4532158293DB	5/30/2006	\$44.60
7993706801DB	6/1/2006	\$61.21
7853804721DB	6/1/2006	\$42.37
7804121380DB	6/1/2006	\$254.68
7804121323DB	6/1/2006	\$54.91
4934219994DB	6/1/2006	\$44.60
4934229001DB	6/2/2006	\$44.60
4934219721DB	6/2/2006	\$42.37
1424186938DB	6/2/2006	\$42.37
7804121489DB	6/5/2006	\$254.68
7804121265DB	6/5/2006	\$254.68
7804089702DB	6/5/2006	\$254.68
4934227823DB	6/5/2006	\$44.60
4532184844DB	6/7/2006	\$43.44
2533105434DB	6/7/2006	\$105.99
1424154555DB	6/7/2006	\$50.18
1424190203DB	6/12/2006	\$63.35
7804032330DB	6/14/2006	\$71.74
4934227948DB	6/14/2006	\$42.37
1462476372DB	6/14/2006	\$44.40
7804032074DB	6/15/2006	\$160.81
4934254603DB	6/15/2006	\$78.15
7853756459DB	6/19/2006	\$42.18
7853756418DB	6/19/2006	\$42.18
4532189603DB	6/20/2006	\$49.33
7804032470DB	6/21/2006	\$201.83
7804032462DB	6/21/2006	\$201.83
7804032405DB	6/21/2006	\$201.83
7804032397DB	6/21/2006	\$201.83
7804032322DB	6/21/2006	\$201.83
1462467165DB	6/23/2006	\$44.60
4532265585DB	6/26/2006	\$44.60
4532264836DB	6/26/2006	\$44.60
4934276051DB	6/27/2006	\$99.97
4532188480DB	6/27/2006	\$44.60
4635209861DB	6/28/2006	\$53.39
4532266864DB	6/28/2006	\$44.60
4532188464DB	6/29/2006	\$44.60
9992403921	6/30/2006	\$506.85
4635193826DB	7/3/2006	\$50.18
4532274298DB	7/5/2006	\$44.60
1424190997DB	7/5/2006	\$144.59
1323748589DB	7/11/2006	\$3,213.61
4532273068DB	7/12/2006	\$50.18
4703872918DB	7/13/2006	\$50.18
4934286274DB	7/17/2006	\$167.09
4934266896DB	7/20/2006	\$47.71

Exhibit B-1

4532214781	7/24/2006	\$763.26
4532213338DB	7/24/2006	\$44.60
4934295648DB	7/25/2006	\$42.37
4532280808DB	7/25/2006	\$55.04
4532214922	7/25/2006	\$801.42
4344786778	7/25/2006	\$869.10
3524445607	7/25/2006	\$687.11
4938066318DB	7/26/2006	\$45.71
164116810	7/26/2006	\$600.92
7853786910	7/31/2006	\$550.85
4344793790DB	8/1/2006	\$202.76
4532207850DB	8/3/2006	\$44.60
4532184570DB	8/4/2006	\$50.18
4865731344DB	8/7/2006	\$179.85
4532175016DB	8/7/2006	\$20.64
3173850716DB	8/8/2006	\$12.95
4428867228DB	8/9/2006	\$25.00
7804121638DB	8/10/2006	\$256.57
4703992880DB	8/11/2006	\$320.13
4532219343DB	8/14/2006	\$44.80
1473163433DB	8/14/2006	\$75.73
7993829652DB	8/15/2006	\$50.40
7804121588DB	8/17/2006	\$101.80
4532327617DB	8/21/2006	\$45.00
0164133849DB	8/21/2006	\$176.03
4934311957DB	8/22/2006	\$42.75
4532342061DB	8/22/2006	\$468.97
7993828829DB	8/23/2006	\$50.63
7854025524DB	8/23/2006	\$424.94
7993750874DB	8/28/2006	\$50.63
4345258439DB	8/28/2006	\$108.13
1462517209DB	8/29/2006	\$45.00
7804475430DB	8/30/2006	\$349.40
4532354090DB	8/30/2006	\$45.00
2934905840DB	8/30/2006	\$1,393.31
4532341220DB	8/31/2006	\$45.00
3524571766DB	8/31/2006	\$50.63
2934917282DB	8/31/2006	\$84.49
4934350484DB	9/1/2006	\$42.75
7993974110DB	9/5/2006	\$50.63
2934906228DB	9/7/2006	\$1,518.69
7993974474DB	9/12/2006	\$50.40
7993974391DB	9/12/2006	\$50.40
4345169008	9/12/2006	\$578.32
2934930137DB	9/14/2006	\$1,367.91
1424256335DB	9/15/2006	\$136.74
1424256343DB	9/18/2006	\$172.54
7994022695DB	9/19/2006	\$50.18
2934917308DB	9/19/2006	\$194.12
1424256467DB	9/19/2006	\$50.18
7994032074	9/20/2006	\$100.13
9203035516DB	9/21/2006	\$128.63

4532358430DB	9/22/2006	\$44.60
4532358265DB	9/22/2006	\$44.60
4532352177DB	9/25/2006	\$44.40
7804030797DB	9/26/2006	\$99.45
4637888498DB	9/27/2006	\$44.40
4637813546DB	9/27/2006	\$44.40
4532358893DC	9/27/2006	\$2,302.02
3725551478DB	9/29/2006	\$49.95
4934365474DB	10/2/2006	\$41.80
4704011169DB	10/2/2006	\$33.20
4637813918DB	10/2/2006	\$44.00
4637813819DB	10/2/2006	\$44.00
1582427524DB	10/2/2006	\$1,059.00
7911573260DB	10/3/2006	\$148.70
7804030540DC	10/3/2006	\$135.26
4934349346DB	10/3/2006	\$52.34
4704021473DB	10/3/2006	\$33.20
7822421170DB	10/4/2006	\$277.98
4704020103DB	10/4/2006	\$33.20
4532375947DB	10/4/2006	\$2,141.89
5203971793DB	10/5/2006	\$267.80
4345090220DB	10/5/2006	\$2,726.74
3035431192DC	10/5/2006	\$49.50
7994030375DB	10/6/2006	\$60.59
2934930806DB	10/6/2006	\$197.32
6414135547DB	10/9/2006	\$287.18
4637868482DB	10/9/2006	\$43.80
2825547906DC	10/9/2006	\$1,757.99
4704043386DB	10/10/2006	\$48.11
4345090287DB	10/10/2006	\$406.91
9203035912DB	10/11/2006	\$203.36
4532368116DB	10/11/2006	\$64.83
7804030664DC	10/13/2006	\$76.33
7804030631DB	10/13/2006	\$132.91
4934424735DC	10/13/2006	\$5.28
4345090386DB	10/16/2006	\$2,712.09
1424311379DB	10/17/2006	\$46.36
7804477469DB	10/18/2006	\$49.05
5514128120DB	10/19/2006	\$191.56
7804030862DB	10/20/2006	\$50.18
4934931077DB	10/20/2006	\$43.25
7804030656DB	10/23/2006	\$177.44
7804030649DB	10/23/2006	\$177.44
4532381283DC	10/23/2006	\$2,219.77
4345213020DC	10/23/2006	\$29.16
4953088065DB	10/24/2006	\$48.80
4773800315DC	10/24/2006	\$9.92
1424311650DD	10/31/2006	\$133.04
1323896487DB	10/31/2006	\$3,080.28
4934411435DB	11/1/2006	\$15.63
4428935462DB	11/3/2006	\$218.49
6051767144DB	11/6/2006	\$54.04

4532649689DC	11/6/2006	\$288.87
2935011218DB	11/7/2006	\$16.50
7804765475DB	11/8/2006	\$41.61
5343779097DC	11/8/2006	\$42.28
5052142594DB	11/8/2006	\$239.42
5051767565DB	11/8/2006	\$62.16
4866596241DB	11/8/2006	\$16.47
4665504782DB	11/8/2006	\$6.26
4532563484DB	11/8/2006	\$82.88
5051767672DB	11/9/2006	\$62.16
4934631016DB	11/9/2006	\$53.59
4934631180DB	11/10/2006	\$9.82
7804738555DB	11/14/2006	\$195.58
4934408084DB	11/14/2006	\$115.17
7804748760DB	11/15/2006	\$195.58
4866647515DB	11/15/2006	\$10.01
4532623114DB	11/21/2006	\$40.08
4345489216DB	11/21/2006	\$2,737.38
7804031621DB	11/22/2006	\$111.61
1462660538DB	11/22/2006	\$155.90
7804758306DB	11/27/2006	\$56.15
3562102903DB	11/27/2006	\$107.33
7804765863DC	11/28/2006	\$2,382.23
7804695672DB	11/28/2006	\$35.32
7804695664DB	11/28/2006	\$38.43
7804743217DB	11/29/2006	\$51.54
7804590717DB	11/30/2006	\$76.87
4934928248RC	12/1/2006	\$334.13
4866770408RC	12/1/2006	\$214.07
4345473962BB	12/1/2006	\$29.15
4773890306DB	12/6/2006	\$6.37
7854225322DC	12/7/2006	\$22.60
4934927489DD	12/7/2006	\$173.39
3562102960DB	12/11/2006	\$109.58
4532620011DB	12/13/2006	\$5.21
4866742944DC	12/14/2006	\$9.24
7804758629DB	12/18/2006	\$35.67
5052163988DB	12/19/2006	\$219.42
4652776219DB	12/19/2006	\$42.49
6022925212DC	12/20/2006	\$21.57
4866876510DB	12/20/2006	\$6.50
		\$89,972.35

Exhibit B-2

Hearing Date and Time: July 23, 2009 at 10:00 a.m. (prevailing Eastern time)
Objection Deadline: July 16, 2009 at 4:00 p.m. (prevailing Eastern time)

STEINBERG SHAPIRO & CLARK
Mark H. Shapiro (MI Bar No. P43134)
24901 Northwestern Hwy., Suite 611
Southfield, Michigan 48075
Telephone: (248) 352-4700
Email: shapiro@steinbergshapiro.com

Attorney for Central Transport International, Inc.

-----X
UNITED STATES BANKRUPTCY COURT :
SOUTHERN DISTRICT OF NEW YORK :
 :
 :
In re: : Chapter 11
 :
DELPHI CORPORATION, et al., :
 : Case No. 05-44481
 :
Debtors. :
 :
-----X

**NOTICE OF MOTION TO ALLOW AND COMPEL PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. § 503(b)**

PLEASE TAKE NOTICE that on June 4, 2009, Central Transport International, Inc.
("CTII"), filed a Motion to Allow and Compel Payment of Administrative Expense Claim
Pursuant to 11 U.S.C. § 503(b) (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the
Motion will be held on July 23, 2009 at 10:00 a.m. (prevailing Eastern Time) (the "Hearing")
before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District
of New York, One Bowling Green, Room 610, New York, New York 10004 (the "Bankruptcy
Court").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, the Supplemental Order Under 11 U.S.C. §§ 102(1) and 105 and Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing Omnibus Hearing Dates and Certain Notice, Case Management, and Administrative Procedures, entered March 20, 2006 (the “Supplemental Case Management Order”) (Docket No. 2883), and the Thirteenth Supplemental Order under 11 U.S.C. §§ 102(1) and 105 and Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing Omnibus Hearing Dates and Certain Notice, Case Management, and Administrative Procedures, entered by this Court on December 4, 2008 (the “Thirteenth Supplemental Case Management Order”), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court’s case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon (i) counsel for the Movant, Mark H. Shapiro, Steinberg Shapiro & Clark, 24901 Northwestern Highway, Suite 611, Southfield, Michigan 48075, (ii) all parties shown on the Master Service List, in each case so as to be received no later than 4:00 p.m. (prevailing Eastern time) on July 16, 2009 (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Supplemental Case Management Order and the Thirteenth Case Management Order will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth

herein and in the Supplemental Case Management Order and the Thirteenth Case Management Order, the Bankruptcy Court may enter an order granting the Motion without further notice.

STEINBERG SHAPIRO & CLARK

/s/ Mark H. Shapiro (MI Bar No. P43134)
Attorney for Central Transport International, Inc.
24901 Northwestern Hwy., Suite 611
Southfield, MI 48075
(248) 352-4700
shapiro@steinbergshapiro.com

Date: June 4, 2009